

NO. 2014-1347

**UNITED STATES COURT OF APPEALS
FOR THE FEDERAL CIRCUIT**

UNITED ACCESS TECHNOLOGIES, LLC,

Plaintiff—Appellant,

v.

CENTURYTEL BROADBAND SERVICES, LLC, QWEST CORPORATION,

Defendants—Appellees.

Appeal from the United States District Court
For the District of Delaware in
Case No. 1:11-CV-00339-LPS, Judge Leonard P. Stark

**PLAINTIFF-APPELLANT’S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

STEVEN CALLAHAN
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(214) 521-6400

Dated: April 23, 2014

Counsel for Plaintiff-Appellant

CERTIFICATE OF INTEREST

Counsel for Plaintiff-Appellant United Access Technologies, LLC certifies the following:

1. The full name of every party or amicus curiae represented by me is: United Access Technologies, LLC.

2. The name of the real party in interest (if the party named in the caption is not the real party in interest) represented by me is: N/A.

3. All parent corporations and any publicly held companies that own 10 percent or more of the stock of the party or amicus curiae represented by me are: None.

4. The names of all law firms and the partners or associates that appeared for the party or amicus curiae now represented by me in the trial court or agency or are expected to appear in this court are:

Shore Chan Depumpo LLP: Michael W. Shore, Alfonso Garcia Chan, Jennifer M. Rynell, Russell DePalma, Daniel F. Olejko.

Stamoulis & Weinblatt LLC: Stamatios Stamoulis, Richard Weinblatt.

Charhon Callahan Robson & Garza, PLLC: Steven Callahan, Brett Charhon.

s/Steven Callahan
STEVEN CALLAHAN

Counsel for Plaintiff-Appellant

Dated: April 23, 2014

**PLAINTIFF-APPELLANT'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO FILE INITIAL BRIEF**

Plaintiff-Appellant United Access Technologies, LLC (“UAT”) files this Unopposed Motion for Extension of Time to File Initial Brief, and respectfully shows as follows:

The current deadline for UAT to file its initial brief is May 12, 2014. *See* Notice of Docketing, ECF No. 1-1; Fed. Cir. R. 31(a)(1)(A). UAT respectfully requests, pursuant to Federal Circuit Rule 26, a forty-five day extension of time—i.e., up to and including June 26, 2014—to file its initial brief.

Good cause exists in support of this extension request. The undersigned counsel was retained by UAT to represent it in connection with this appeal on April 16, 2014. The undersigned counsel has not represented UAT before, and did not represent UAT during the district court’s proceedings. Counsel will need additional time to become familiar with the district court’s decision, the record in the district court, and the facts and legal principles applicable to this appeal. Additionally, UAT has not been granted a previous extension with respect to its initial brief. Pursuant to Federal Circuit Rule 26(b)(5), UAT submits the Declaration of Steven Callahan in support of its extension request.

UAT has advised Appellees of the present extension request, and has

been advised that Appellees are not opposed to the requested extension. UAT further states that this motion is filed at least seven days before the date sought to be extended in accordance with Federal Circuit Rule 26(b)(1).

For these reasons, UAT respectfully requests that the Court grant the instant motion.

Dated: April 23, 2014

Respectfully submitted,

s/Steven Callahan

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DECLARATION OF STEVEN CALLAHAN

I, Steven Callahan, declare as follows:

1. I am over the age of twenty-one and have never been convicted of any felony. I have personal knowledge of the following facts and statements in this declaration and, if called as a witness, I could and would testify competently thereto.

2. I represent United Access Technologies, LLC (“UAT”) in the

above-referenced appeal.

3. I have calculated the current deadline for UAT to file its initial brief as May 12, 2014.

4. Good cause exists in support of UAT's present extension request for a forty-five day extension of time—i.e., up to and including June 26, 2014—to file its initial brief. The undersigned was retained by UAT to represent it in connection with this appeal only recently (i.e., on April 16, 2014). Neither the undersigned nor my firm has represented UAT before, and we did not represent UAT during the district court's proceedings.

5. Counsel will need additional time to become familiar with the district court's decision, the record in the district court, and the facts and legal principles applicable to this appeal. Additionally, UAT has not been granted a previous extension with respect to its initial brief.

6. Appellees have been advised of the present extension request, and have indicated that they are not opposed to the requested relief.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Dallas, Texas on the 23rd day of April, 2014.

s/Steven Callahan
STEVEN CALLAHAN

CERTIFICATE OF SERVICE

I certify that, on April 23, 2014, I caused the foregoing document to be filed with the United States Court of Appeals for the Federal Circuit using its CM/ECF system, which will send an electronic notice of the filing to the following counsel for Appellees:

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Dated: April 23, 2014

s/Steven Callahan
STEVEN CALLAHAN